

PUBLIC SUBMISSION

As of: October 19, 2009 Tracking No. 80a42f4d Comments Due: January 05, 2010

Docket: [IRS-2008-0103](#)

Request for Information Regarding Sections 101 Through 104 of the Genetic Information Nondiscrimination Act of 2008

Comment On: [IRS-2008-0103-0017](#)

Interim Final Rules Prohibiting Discrimination Based on Genetic Information in Health Insurance Coverage and Group Health Plans

Document: [IRS-2008-0103-0019](#)

Comment on FR Doc # E9-22504

Submitter Information

Name: Daniel E Colacino

Address:

East Greenbush, NY,

Organization: Rose and Kiernan, Inc

General Comment

With regard to the prohibition on incentives for employees to take a health risk assessment or participate in a wellness program.

Wellness programs are the only initiative that has shown any promise in restraining health care costs. 75% of health care costs are avoidable and lifestyle related. Wellness programs provide an avenue for employees and their families to improve their health status, live a healthier life and have an impact on health care costs.

Most employees have to be incented to get involved in a wellness plan, a sad but true fact. Removing incentives will only have a negative effect on health care costs in this country.

The University of Michigan and Dee Eddington have conducted research study after research study, each confirming the positive impact of wellness programs and the positive effect of incentives.

Health risk appraisals are a key part of wellness programs since they provide the employee and their family with information on their health and steps they can take to improve.

This is not underwriting, it's not denying anybody and health care or health insurance and it's totally voluntary.

This rule must be revised prior to final implementation to eliminate any prohibitions against incentives for wellness plans or HRAs